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URGENT CARE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
COMPANY,

Plaintiffs,

vs.

RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI
R. SHAH, MD, LTD.; and RADAR MEDICAL
GROUP, LLP dba UNIVERSITY URGENT
CARE, Does 1-100, and ROES 101-200,

Defendants.

AND RELATED CLAIMS.

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR FILING
JOINT STATUS REPORT**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of
7 record, stipulate and agree as follows:

8 1. On January 17, 2018, Todd Baxter, Esq. (counsel for the Allstate Parties) and Joshua
9 P. Gilmore, Esq. (counsel for the Radar Parties) participated in a telephonic meet and confer (lasting
10 approximately 1.5 hours) regarding the Allstate Parties’ supplemental discovery responses. They
11 agreed to conduct an additional telephonic meet and confer on January 19, 2018;

12 2. On January 18, 2018, Mr. Gilmore sent an email to Mr. Baxter identifying items to be
13 discussed during a telephonic meet and confer related to the Allstate Parties’ supplemental discovery
14 responses in the matter entitled *Allstate Insurance Co., et al. v. Marjorie Belsky, M.D., et al.*, United
15 States District Court, District of Nevada, Case No. 2:15-cv-02265-MMD-CWH (the “Belsky
16 Matter”), some of which overlapped with the items already discussed during the January 17, 2018
17 meet and confer in this matter;

18 3. Due to unanticipated scheduling conflicts, and in order to allow sufficient time for
19 Mr. Baxter to review Mr. Gilmore’s January 18, 2018 email, Messrs. Gilmore and Baxter
20 rescheduled their January 19, 2018 telephonic meet and confer to January 24, 2018;

21 4. Pursuant to the December 28, 2017 Minute Order [ECF No. 216], the parties have
22 until today to file a Joint Status Report indicating whether any dispute remains regarding the Allstate
23 Parties’ supplemental discovery responses and, if so, setting forth the parties’ respective positions
24 (subject to further briefing as may be requested by the Court);

25 5. For efficiency’s sake, and due to the overlap in discovery requests and responses
26 between this matter and the Belsky Matter, the parties shall have until January 26, 2018 to file a
27 Joint Status Report in this matter related to the Allstate Parties’ supplemental discovery responses.
28 The parties will thereafter appear for a status hearing as may be requested by the Court;

6. The parties do not anticipate any further requests for extending the deadline to file the Joint Status Report in this matter; and

7. Consistent with prior Stipulations, the parties request that the Court reserve any ruling on sanctions.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 22nd day of January, 2018.

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/ Todd W. Baxter
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Attorneys for Plaintiffs/Counterdefendants

DATED this 22nd day of January, 2018.

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By: /s/ Joshua P. Gilmore
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Attorneys for Defendants & Counterclaimant

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: January 23, 2018